

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Case No. 16-20204-JAD  
:  
: CHAPTER 13  
:  
JAMES L. GARLAND, Jr. :  
MARCI Jo GARLAND :  
Debtors :  
\*\*\*\*\*  
RONDA J. WINNECOUR, Chapter 13 : Docket No.  
Trustee, . : Related to Docket Nos.  
Movant s:  
vs. : Hearing Date and Time:  
: Thursday, April 3, 2019 at 10:00 A.M.  
JAMES L. GARLAND, Jr. :  
MARCI Jo GARLAND :  
Respondents :

**RESPONSE TO MOTION FOR STATUS CONFERENCE**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted in part. New Counsel will file proceedings to avoid the Default Judgement
6. Admitted in part. By way of further Answer, Attorney Golembiewski has experienced a myriad of personal, financial and medical difficulties which have hindered his practice. Consequently, Attorney Golembiewski is winding up his practice and turning over his cases to alternative counsel.
7. Respondents aver that no response is required to the averment contained in Movant's paragraph 7.

**WHEREFORE**, Counsel for the Debtor so reports.

Date: March 13, 2019

Respectfully submitted,

/s/ Jeffrey S. Golembiewski  
Jeffrey S. Golembiewski, Esquire  
PA I.D. #64373  
254 Miller Farm Road  
Uniontown PA 15401  
Ph: (724) 322-4893